



THE CITY OF NEW YORK  
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June 6, 2025

**BY ECF**

Honorable Pamela K. Chen  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Honorable Lois Bloom  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Tony Harrison v. Correctional Officer Hodge, et al.,  
96-CV-1465 (PKC) (LB)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney representing Detectives Sanchez, Kennedy, and Mullhall in the above-referenced matter. I write pursuant to the Court's Order dated May 14, 2025 (ECF No. 95), directing this Office to provide a status update by June 6, 2025, addressing the one remaining file relevant to identifying C.O. "Steward" and whether it has ascertained that one of the three potential C.O. "Steward" candidates is the defendant plaintiff is trying to identify.

As previously reported, pursuant to the Court's Order dated March 24, 2025 (ECF No. 87), we have conducted an exhaustive review of Department of Correction ("DOC") personnel files for all Black male correction officers with the surnames Steward, Stewart, or Stuart who were employed by DOC in 1996. Of the files we obtained, only three individuals were plausible candidates for C.O. "Steward," with all other files containing information that definitively ruled out those individuals.

As of our last status report on May 13, 2025, we were awaiting one remaining personnel file to complete our review. We have since contacted DOC regarding this outstanding file and are awaiting a response from the records department.

As to the first candidate, we managed to successfully contact him by telephone. Through our conversation with this individual, we were able to definitively eliminate him from consideration as he was not assigned to Anna M. Kross Center (“AMKC”) or Kings County Hospital Prison Ward (“KCHPW”) on the date of the incident in question.

As to the second candidate, upon further review of his personnel files, we have determined that this individual's assignment on the date of the incident does not match the facility assignments alleged by plaintiff in his complaint. Accordingly, we can rule out this candidate.

As to the third candidate, to date we have been unable to reach him via telephone. On May 23, 2025, we sent him certified letters via first-class mail. These letters were sent to both his last known address as provided by DOC and to an out-of-state address obtained by cross-referencing employee data with public records. Based on current tracking information, on information and belief, this mail has not yet reached the intended recipient.

We remain hopeful that if, as plaintiff has indicated, C.O. Hodge and Correction Officer Steward were partners or worked together, Mr. Hodge may be able to provide assistance in identifying the correct individual if and when he is successfully brought into this case.

While we have made significant progress in narrowing the potential candidates and eliminating individuals who could not have been involved in the incident, the nearly 30-year time lapse since the events alleged in the complaint continues to present substantial challenges in definitively identifying “C.O. Steward.” We will continue to pursue all available avenues to locate and identify this individual.

The City thanks the Court for its time and consideration of this matter.

Respectfully submitted,

*Joseph Zangrilli /s/*

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Cc: **VIA FIRST CLASS MAIL**  
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